

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

BASIL C. POLLITT, D/B/A THE GAS)	
GROUP INCORPORATED AND)	
POLLITT ENTERPRISES, INC.)	
_____)	CASE NO.
)	2018-00103
ALLEGED FAILURE TO COMPLY WITH)	
KRS 278.495, 807 KAR 5:022, AND)	
49 C.F.R. PART 192)	
)	

ORDER

Basil C. Pollitt, doing business as The Gas Group Incorporated and Pollitt Enterprises, Inc., and Clark Pollitt (collectively, “Pollitt”) operate a natural gas system (the “Pollitt System”) that distributes and sells natural gas to approximately 28 residential customers in Warren County, Kentucky. In Case No. 2017-00120,¹ the Commission found that Pollitt is engaged in the distribution and sale of natural gas to the public for compensation and is, therefore, a natural gas distribution utility² subject to Commission jurisdiction.³

KRS 278.495 grants the Commission authority to regulate the safety of natural gas facilities owned or operated by any public utility and to enforce minimum safety standards

¹ *Pollitt Enterprises, Inc., et al.*, Case No. 2017-00120 (Ky. PSC Dec. 27, 2017).

² KRS 278.010(3)(b).

³ Pollitt has filed an action in the Franklin Circuit Court for judicial review of the Commission’s order in Case No. 2017-00120, which action remains pending. *See Pollitt Enterprises, Inc., et al. v. Kentucky Public Service Commission, et al.*, Civil Action No. 18-CI-69 (Franklin Circuit Court).

adopted by the United States Department of Transportation (“USDOT”) pursuant to the federal pipeline safety laws, 49 U.S.C. Section 60101, *et seq.*, and amendments thereto. Any person who violates any federal minimum safety standard or Commission regulation governing the safety of pipeline facilities is subject to assessment of a civil penalty under KRS 278.992(1).

KRS 278.030 requires every utility to furnish “adequate, efficient and reasonable” service. KRS 278.260 permits the Commission, upon its own motion, to investigate any act or practice of a utility that affects or is related to the service of a utility. KRS 278.280(1) further permits the Commission, after conducting such investigation and finding that a practice is unreasonable, unsafe, improper, or inadequate, to determine the reasonable, safe, proper, or adequate practice or methods to be observed and to fix same by Order.

Pursuant to KRS 278.280(2), which directs the Commission to prescribe rules and regulations for the performance of services by utilities, the Commission has promulgated Administrative Regulation 807 KAR 5:006, Section 25, which requires all utilities to adopt and execute a safety program, and 807 KAR 5:022, which establishes minimum operation and safety requirements for natural gas utilities.

Prior to entry of the final order in Case No. 2017-00120, the Commission, on its own motion, ordered that an inspection of the Pollitt System be conducted by Commission Staff “to better assist the Commission in reaching a decision” in the case.⁴ Because the Commission had not yet ruled on the jurisdictional status of Pollitt, Commission Staff performed both a distribution system inspection and a gathering line inspection.

⁴ *Pollitt Enterprises, Inc., et al.*, Case No. 2017-00120 (Ky. PSC Sept. 19, 2017), at 1.

Commission Staff prepared a report (“Staff Report”), which was filed into the record in Case No. 2017-00120 and is attached as an Appendix to this Order.

Based on its investigation of the Pollitt System, Commission Staff determined that Pollitt was in violation of multiple federal and state minimum pipeline safety standards. In its report, Commission Staff alleges that Pollitt committed the following violations:

1. Failure to develop and implement a written damage prevention program as required by 49 C.F.R. Section 192.614 and 807 KAR 5:022, Section 13(8).
2. Failure to develop and implement a written operator qualification program as required by 49 C.F.R. Section 192.805.
3. Failure to develop and implement a distribution pipeline integrity management program as required by 49 C.F.R. Section 192.1005.
4. Failure to develop and implement a written public education program as required by 49 C.F.R. Section 192.616 and 807 KAR 5:022, Section 13 (9)(d).
5. Failure to ensure odorization of gas in the Pollitt System as required by 49 C.F.R. Section 192.625 and 807 KAR 5:022, Section 13(17).
6. Failure to test customer meters at least once every ten years as required by 807 KAR 5:022, Section 8(5)(a)(1).

Based on its review of the Staff Report and being otherwise sufficiently advised, the Commission finds that *prima facie* evidence exists that Pollitt has failed to comply with state and federal minimum pipeline safety standards. The Commission further finds that it should conduct a formal investigation into the operation of the Pollitt System and that this investigation should examine the adequacy, safety, and reasonableness of Pollitt’s practices related to the construction, installation, maintenance, and operation of natural gas facilities.

The Commission, on its own motion, HEREBY ORDERS that:

1. Pollitt shall submit to the Commission, within 20 days of the entry date of this Order, a written response to the allegations contained in the Staff Report.
2. Pollitt shall appear on July 10, 2018, at 9 a.m., Eastern Daylight Time, in Hearing Room 1 of the Commission's offices at 211 Sower Boulevard in Frankfort, Kentucky, for the purpose of presenting evidence concerning the alleged violations of 49 C.F.R. Part 192 and 807 KAR 5:022, and to show cause why it should not be subject to the penalties prescribed in KRS 278.992(1) for these alleged violations.
3. At the scheduled hearing in this matter, Pollitt shall also present evidence on the adequacy, safety, and reasonableness of its practices related to the construction, installation, maintenance, and operation of natural gas facilities.
4. The July 10, 2018 hearing shall be recorded by digital video recording only.
5. The Staff Report attached as an Appendix to this Order is made a part of the record in this case.

By the Commission

ENTERED
APR 06 2018
KENTUCKY PUBLIC
SERVICE COMMISSION

ATTEST:


Executive Director

APPENDIX

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE
COMMISSION IN CASE NO. 2017-00103 DATED **APR 06 2018**

INSPECTION REPORT

INSPECTION INFORMATION

KY PSC Inspector(s):	Joel Grugin	Report Number:	102317
Inspection Date(s):	10/9 & 17/2017	Report Date:	10/23/2017
Inspection Type:	<input checked="" type="checkbox"/> Standard <input type="checkbox"/> Integrity Management <input type="checkbox"/> Operator Qualification <input type="checkbox"/> Compliance Follow-up <input type="checkbox"/> Construction		

OPERATOR INFORMATION

Name of Operator:	The Gas Group/Pollitt Enterprises Inc.	OP ID No.: (If no OP ID No., explain if an application has been submitted.)	
Type of Facility:	Distribution or Gathering	Location of Facility:	Office: Louisville, Facilities: Warren, Butler, Edmonson, & Grayson Counties
Area of Operation:	Grayson, Warren, Edmonson and Butler Counties		
Official Operator Contact and Address: (Contact for Inspection Letter)		Unit Name and Address	
Basil Pollitt, Owner The Gas Group/Pollitt Enterprises Inc. 13517 Saddle Creek Drive Louisville, KY 40245			
Phone # and Email:	270-302-9236, email-gasgroupinc@yahoo.com		
Records Location:	13517 Saddle Creek Drive, Louisville		
<u>Persons Interviewed</u>	<u>Title</u>	<u>Phone No.</u>	<u>Email</u>
Basil. Pollitt	Owner	270-303-9236	gasgroupinc@yahoo.com
Kirk Hoskins	Attorney	502-821-9001	hoskins@kirk.win.net
Has the Operator provided an updated Emergency Contact List? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Number of Customers:	28 with 36 meters		
Number of Gas Employees:	0		
Gas Supplier:	From 6 wells. Southern Kentucky Energy was suppling gas on the northern end at the time of inspections.		
Unaccounted for Gas:	Undetermined. 3 wells are unmetered. 3 wells have meters		
Services:	Residential	Commercial	Industrial Other
	Approximately 85		
Operating Pressure(s):	MAOP (within last year)	Actual Operating Pressure (at time of inspection)	
	Feeder:	50 psig. at inlet. No test records	
	Town:		
	Other:		
Does the Operator have any transmission pipeline (above 20% SMYS):			
Additional Operator Information:			

Date of Last Inspection:		Number of Deficiencies:	
		Deficiencies not Cleared:	

Summary of Areas Inspected

<u>PHMSA Question Set</u>		
<input checked="" type="checkbox"/> Emergency Plan	<input checked="" type="checkbox"/> Operations and Maintenance Plan	<input checked="" type="checkbox"/> Critical Valves Maintenance Inspections
<input checked="" type="checkbox"/> Cathodic Protection	<input type="checkbox"/> Accidents	<input checked="" type="checkbox"/> Leak Surveys
<input checked="" type="checkbox"/> Odorization	<input checked="" type="checkbox"/> Operator Qualification	<input checked="" type="checkbox"/> Damage Prevention
<input checked="" type="checkbox"/> Pipeline Markers	<input type="checkbox"/> Regulator Stations	<input checked="" type="checkbox"/> DIMP
<input checked="" type="checkbox"/> Field Inspection	<input type="checkbox"/> Other	
<u>Other:</u>		

<u>State Question Set</u>	
<input type="checkbox"/> Cybersecurity	<input type="checkbox"/> Other
<u>Other:</u>	

Summary

A standard distribution inspection was performed as ordered by the Commission on its own motion in case number 2017-00120 on this operator. A standard federal inspection checklist was used. The Operating and Maintenance, Emergency, Damage Prevention, Operator Qualification, Drug and Alcohol, DIMP and Public Awareness Plans were requested during the office visit. Also requested were records pertaining to leakage surveys and repairs, valve inspections, patrolling and corrosion control. The 2002 Operating & Maintenance, Emergency, and Drug & Alcohol plans were provided. Also applicable to this inspection were the regulations set forth in Title 807 Chapter 5 of Kentucky state code.

Since the owner and operator has stated in official legal proceedings that the Gas Group system was designed and built as a gathering line system, a gathering line inspection was simultaneously conducted at the same time of the distribution inspection.

Probable Violations

Distribution System inspection:

There were 139 federal code deficiencies documented by the inspection checklist. The operator did not have 4 required plans (Damage prevention, Operator Qualification, DIMP and Public Awareness). Because of this, many of the deficiencies cited pertained to specific questions about such plans that did not exist.

The operator was also in violation of the following state codes:

1. 807 KAR 5:022 Section 8 (5)(a)(1) positive displacement meters, with rated capacity up to and including 500 cubic feet per hour, shall be tested at least once every ten years.

No gas Group meters have been tested.

2. 807 KAR 5:022 Section 13 Operations. (17) Odorization of gas. Combustible gas in a distribution line shall contain a natural odorant or be odorized so that at a concentration in air of 1/5 of the lower explosive limit (approximately one (1) percent by volume), gas is readily detectable by a person with a normal sense of smell.

Gas tested 10/17/2017 at a drip tank located behind the Richardsville fire department did not meet this requirement. The gas tested at 1.66 % gas in air.

Gathering Line System Inspection:

1. 807 KAR 5:026 Section 6. Customer Lines and Metering Facilities (11) Each customer's service shall have an automatic shutoff valve with manual reset to stop gas flow if gas pressure fails. The valve may be part of the final stage regulator and shall have operating pressure of eight (8) ounces with shutoff pressure setting of not less than two (2) ounces.

None of the Gas Group's regulators observed had low pressure shutoff with manual reset and the operator stated there were none installed in the system.

2. 49 CFR 192.625(a) Odorization of gas. A combustible gas in a distribution line must contain a natural odorant or be odorized so that at a concentration in air of one-fifth of the lower explosive limit, the gas is readily detectable by a person with a normal sense of smell.

The gas tested on 10/17/2017 at a drip tank behind the Richardsville fire department did not have the required odorant level. The gas tested at 1.66 % gas in air.

3. 278.485 Section 3. The construction of each service line...shall be under the supervision of the PSC and shall conform to such standards of safety, location, and convenience as may be prescribed by said commission.

No records were found/provided indicating that The Gas Group/Pollitt Enterprises Inc. requested an inspection of the "farm-tap" service lines.

Areas of Concern

If this system is determined to be a gathering system, following are requirements that must be completed by The Gas Group/Pollitt Enterprises Inc. to be in compliance with Federal Code going forward:

1. 49 CFR 192.740 Pressure regulating, limiting, and overpressure protection – Individual service lines directly connected to production, gathering, or transmission pipelines states in part that each pressure regulating or limiting device, relief device and associated equipment must be inspected and tested at least once every 3 calendar years, not exceeding 39 months.

2. 49 CFR 192.8(a) How are onshore gathering lines and regulated onshore gathering lines determined? An operator must make the determination if his pipeline is a "regulated onshore gathering line".

Submitted by:



10/23/2017

Inspector (date)
Utility Regulatory and Safety Investigator

Procedures - Reporting *

*** 1. Immediate Reporting: Incidents (detail)** *Is there a process to immediately report incidents to the National Response Center? (RPT.RR.IMMEDREPORT.P) (detail)*

191.5(b) (191.7)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

*** 2. Incident Reports (detail)** *Does the process require preparation and filing of an incident report as soon as practicable but no later than 30 days after discovery of a reportable incident? (RPT.RR.INCIDENTREPORT.P) (detail)*

191.15(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Supplemental Incident Reports (detail) *Does the process require preparation and filing of supplemental incident reports? (RPT.RR.INCIDENTREPORTSUPP.P) (detail)*

191.15(c)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

*** 4. National Registry of Pipeline and LNG Operators (OPID) (detail)** *Does the process require the obtaining, and appropriate control, of Operator Identification Numbers (OPIDs)? (RPT.RR.OPID.P) (detail)*

191.22

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Operator has no Operator I.D number

5. Safety Related Condition Reports (detail) *Do the procedures require reporting of safety-related conditions? (RPT.RR.SRCR.P) (detail)*

192.605(a) (191.23(a); 191.25(a); 191.25(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

6. Offshore Pipeline Condition Reports (detail) Does the process require reports to be submitted within 60 days after completing inspection of underwater pipelines in GOM and its inlets? (RPT.RR.OPCR.P) (detail)

191.27(a) (191.27(b); 192.612(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Safety Related Conditions (detail) Does the process include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that may potentially be safety-related conditions? (MO.GO.SRC.P) (detail)

192.605(d)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Customer and EFV Installation Notification

1. Customer Notification (detail) Is a customer notification process in place that satisfies the requirements of 192.16? (MO.GO.CUSTNOTIFY.P) (detail)

192.13(c) (192.16(a); 192.16(b); 192.16(c); 192.16(d))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in plan.

2. EFV Installation (detail) Is there an adequate excess flow valve (EFV) installation and performance program in place? (MO.GO.EFVINSTALL.P) (detail)

192.383(b) (192.381(a); 192.381(b); 192.381(c); 192.381(d);
192.381(e); 192.383(a); 192.383(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in plan.

Procedures - Normal Operating and Maintenance

1. Normal Maintenance and Operations (detail) Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year? (MO.GO.OMANNUALREVIEW.P) (detail)

192.605(a)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

This was in the plan but the plan was written in 2002 and not updated since.

2. Normal Operations and Maintenance Procedures - History (detail) Does the process include requirements for making construction records, maps and operating history available to appropriate operating personnel? (MO.GO.OMHISTORY.P) (detail)

192.605(a) (192.605(b)(3))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in plan.

3. Normal Operations and Maintenance Procedures (detail) Does the process include procedures for starting up and shutting down any part of the pipeline in a manner to assure operation with the MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices? (MO.GOMAOP.MAOPLIMIT.P) (detail)

192.605(a) (192.605(b)(5))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in plan.

4. Normal Operations and Maintenance Procedures - Review (detail) Does the process include requirements for periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operations and maintenance and modifying the procedures when deficiencies are found? (MO.GO.OMEFFECTREVIEW.P) (detail)

192.605(a) (192.605(b)(8))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in plan.

5. Safety While Making Repairs (detail) Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property? (AR.RMP.SAFETY.P) (detail)

192.605(b)(9) (192.713(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

6. Holders (detail) Does the process include systematic and routine testing and inspection of pipe-type or bottle-type holders? (MO.GM.HOLDER.P) (detail)

192.605(a) (192.605(b)(10))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Gas Odor Response (detail) Does the process require prompt response to the report of a gas odor inside or near a building? (MO.GO.ODDOR.P) (detail)

192.605(a) (192.605(b)(11))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Change in Class Location

1. Change in Class Location Required Study (detail) Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS? (MO.GOCLASS.CLASSLOCATESTUDY.P) (detail)

192.605(b)(1) (192.609(a); 192.609(b); 192.609(c); 192.609(d); 192.609(e); 192.609(f))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No class location study has been performed

*** 2. Change in Class Location Confirmation or Revision of MAOP (detail)** Does the process include a requirement that the MAOP of a pipeline segment be confirmed or revised within 24 months whenever the hoop stress corresponding to the established MAOP is determined not to be commensurate with the existing class location? (MO.GOCLASS.CLASSLOCATEREV.P) (detail)

192.605(b)(1) (192.611(a); 192.611(b); 192.611(c); 192.611(d))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan.

Procedures - Continuing Surveillance

1. Continuing Surveillance (detail) Does the process include procedures for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists? (MO.GO.CONTSURVEILLANCE.P) (detail)

192.605(e) (192.613(a); 192.613(b); 192.703(b); 192.703(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

The operator performs 1 yearly patrol with a leak detector and the requirement is 2 per year.

Procedures - Damage Prevention Program

1. Damage Prevention Program (detail) Is a damage prevention program approved and in place? (PD.OC.PDPROGRAM.P) (detail)

192.614(a)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

The operator is not a member of a "Qualified" one call system.

Procedures - Emergency

1. Receiving Notices (detail) Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response? (EP.ERG.NOTICES.P) (detail)

192.615(a)(1)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Emergency Response Communication (detail) Does the emergency plan include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials? (EP.ERG.COMMSYS.P) (detail)

192.615(a) (192.615(a)(2))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

*** 3. Emergency Response (detail)** Does the emergency plan include procedures for making a prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, a fire or explosion near or directly involving a pipeline facility, or a natural disaster? (EP.ERG.RESPONSE.P) (detail)

192.615(a) (192.615(a)(3); 192.615(a)(11); 192.615(b)(1))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Emergency Response (detail) Does the process include procedures for ensuring the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency? (EP.ERG.READINESS.P) (detail)

192.615(a) (192.615(a)(4))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Emergency Response - Actions (detail) Does the emergency plan include procedures for taking actions directed toward protecting people first and then property? (EP.ERG.PUBLICPRIORITY.P) (detail)

192.615(a) (192.615(a)(5))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Emergency Response (detail) Does the emergency plan include procedures for the emergency shutdown or pressure reduction in any section of pipeline system necessary to minimize hazards to life or property? (EP.ERG.PRESSREDUCESD.P) (detail)

192.615(a) (192.615(a)(6))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Emergency Response - Hazards (detail) Does the emergency plan include procedures for making safe any actual or potential hazard to life or property? (EP.ERG.PUBLICHAZ.P) (detail)

192.605(a) (192.615(a)(7))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

8. Public Official Notification (detail) Does the emergency plan include procedures for notifying appropriate public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency? (EP.ERG.AUTHORITIES.P) (detail)

192.615(a) (192.615(a)(8))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Service Outage Restoration (detail) Does the emergency plan include procedures for safely restoring any service outage? (EP.ERG.OUTAGERESTORE.P) (detail)

192.615(a) (192.615(a)(9))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan.

10. Incident Investigation Actions (detail) Does the process include procedures for beginning action under §192.617, if applicable, as soon after the end of the emergency as possible? (EP.ERG.INCIDENTACTIONS.P) (detail)

192.615(a) (192.615(a)(10))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Emergency Response Training (detail) Does the process include training of the appropriate operating personnel to assure they are knowledgeable of the emergency procedures and verifying that the training is effective? (EP.ERG.TRAINING.P) (detail)

192.615(b)(2)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan.

12. Emergency Response Performance (detail) Does the process include detailed steps for reviewing employee activities to determine whether the procedures were effectively followed in each emergency? (EP.ERG.POSTEVNTREVIEW.P) (detail)

192.615(b)(3)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan.

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

13. Liaison with Public Officials (detail) Does the process include steps for establishing and maintaining liaison with appropriate fire, police and other public officials and utility owners? (EP.ERG.LIAISON.P) (detail)

192.615(c) (192.615(c)(1); 192.615(c)(2); 192.615(c)(3);
192.615(c)(4); ADB-05-03)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Public Awareness Program

1. Public Education Program (detail) Has the continuing public education (awareness) program been established as required? (PD.PA.PROGRAM.P) (detail)

192.616(a) (192.616(h))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No public Awareness plan.

2. Management Support of Public Awareness Program (detail) Does the operator's program documentation demonstrate management support? (PD.PA.MGMTSUPPORT.P) (detail)

192.616(a) (API RP 1162 Section 2.5; API RP 1162 Section 7.1)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

3. Asset Identification (detail) Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each? (PD.PA.ASSETS.P) (detail)

192.616(b) (API RP 1162 Section 2.7 Step 4)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

4. Audience Identification (detail) Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents? (PD.PA.AUDIENICEID.P) (detail)

192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2;
API RP 1162 Section 3)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

5. Messages, Delivery Methods, and Frequencies (detail) Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported? (PD.PA.MESSAGES.P) (detail)

192.616(c) (API RP 1162 Section 3; API RP 1162 Section 4; API RP 1162 Section 5)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

6. Consideration of Supplemental Enhancements (detail) Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162? (PD.PA.SUPPLEMENTAL.P) (detail)

192.616(c) (API RP 1162 Section 6.2)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

7. Other Languages (detail) Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas? (PD.PA.LANGUAGE.P) (detail)

192.616(g) (API RP 1162 Section 2.3.1)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

8. Evaluation Plan (detail) Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated? (PD.PA.EVALPLAN.P) (detail)

192.616(i) (192.616(c); API RP 1162 Section 8; API RP 1162 Appendix E)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

9. Master Meter and Petroleum Gas Systems (detail) Does the master meter or petroleum gas system operator's process meet the requirements of 192.616(j)? (PD.PA.MSTRMETER.P) (detail)

192.616(j) (192.616(h))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Failure Investigation

1. Incident Investigation (detail) Does the process include procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence? (EP.ERG.INCIDENTANALYSIS.P) (detail)

192.617

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - MAOP

1. Maximum Allowable Operating Pressure Determination (detail) Does the process include procedures for determining the maximum allowable operating pressure for a pipeline segment in accordance with 192.619? (MO.GOMAOP.MAOPDETERMINE.P) (detail)

192.605(b)(1) (192.619(a); 192.619(b); 192.621(a); 192.621(b); 192.623(a); 192.623(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Pressure Test

1. Test Acceptance Criteria and Procedures (detail) Were test acceptance criteria and procedures sufficient to assure the basis for an acceptable pressure test? (AR.PTI.PRESSTESTACCEP.P) (detail)

192.503(a) (192.503(b); 192.503(c); 192.503(d); 192.505(a); 192.505(b); 192.505(c); 192.505(d); 192.505(e); 192.507(a); 192.507(b); 192.507(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Odorization of Gas

1. Odorization of Gas (detail) Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with §192.625? (MO.GOODOR.ODORIZE.P) (detail)

192.605(b)(1) (192.625(a); 192.625(b); 192.625(c); 192.625(d); 192.625(e); 192.625(f))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No odor tests have been performed.

Procedures - Tapping Pipelines Under Pressure

1. Tapping Pipelines Under Pressure (detail) *Is the process adequate for tapping pipelines under pressure?* (AR.RMP.HOTTAP.P) (detail)

192.605(b)(1) (192.627)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Procedure is not detailed enough.

2. Qualification of Personnel Tapping Pipelines under Pressure (detail) *Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?* (TQ.QU.HOTTAPQUAL.P) (detail)

192.627 (192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Pipeline Purging

1. Pipeline Purging (detail) *Does the process include requirements for purging of pipelines in accordance with 192.629?* (MO.GOODOR.PURGE.P) (detail)

192.605(b)(1) (192.629(a); 192.629(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Control Room Management

See separate Control Room Management question set.

Procedures - Transmission Lines - Patrolling & Leakage Survey

1. Patrolling Requirements (detail) *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?* (PD.RW.PATROL.P) (detail)

192.705(a) (192.705(b); 192.705(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

2. Leakage Surveys (detail) *Does the process require leakage surveys to be conducted? (PD.RW.LEAKAGE.P) (detail)*

192.706 (192.706(a); 192.706(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Distribution System Patrolling & Leakage Survey

1. Distribution System Leakage Surveys (detail) *Does the process require distribution system patrolling and leakage surveys to be conducted? (PD.RW.DISTLEAKAGE.P) (detail)*

192.721 (192.721(a); 192.721(b); 192.723(a); 192.723(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Line Marker

1. ROW Markers Requirements (detail) *Does the process adequately cover the requirements for placement of ROW markers? (PD.RW.ROWMARKER.P) (detail)*

192.707(a) (192.707(b); 192.707(c); 192.707(d); CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Transmission Record Keeping

1. Transmission Lines Record Keeping (detail) *Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test? (MO.GM.RECORDS.P) (detail)*

192.605(b)(1) (192.709(a); 192.709(b); 192.709(c); 192.743(f))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Transmission Field Repair

1. Transmission Lines Permanent Field Repair of Defects (detail) *Is the process adequate for the permanent field repair of defects in transmission lines?* (AR.RMP.FIELDREPAIRDEFECT.P) (detail)

192.605(b)(1) (192.713(a); 192.713(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Transmission Lines Permanent Field Repair of Welds (detail) *Is the process adequate for the permanent field repair of welds?* (AR.RMP.FIELDREPAIRWELDS.P) (detail)

192.605(b) (192.715(a); 192.715(b); 192.715(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

3. Transmission Lines Permanent Field Repair of Leaks (detail) *Is there an adequate process for the permanent field repair of leaks on transmission lines?* (AR.RMP.FIELDREPAIRLEAK.P) (detail)

192.605(b) (192.717(a); 192.717(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Transmission Lines Testing of Repairs (detail) *Is the process adequate for the testing of replacement pipe and repairs made by welding on transmission lines?* (AR.RMP.WELDTTEST.P) (detail)

192.605(b) (197.719(a); 197.719(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Test Requirements for Reinstating Service Lines

1. Test Reinstated Service Lines (detail) *Is the process adequate for the testing of disconnected service lines?* (AR.RMP.TESTREINSTATE.P) (detail)

192.605(b) (197.725(a); 197.725(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in the plan.

Procedures - Abandonment or Deactivation of Facilities

1. Abandonment or Deactivation of Pipe and Facilities (detail) Does the process include procedures for the abandonment and deactivation of pipelines that are in accordance with 192.727? (MO.GM.ABANDONPIPE.P) (detail)

192.605(b)(1) (192.727(a); 192.727(b); 192.727(c); 192.727(d); 192.727(e); 192.727(f); 192.727(g))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Procedure was not adequate.

Procedures - Pressure Limiting and Regulating Station

1. Pressure Limiting and Regulating Stations Inspection and Testing (detail) Does the process include procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station and their equipment at intervals not exceeding 15 months, but at least once each calendar year as required? (MO.GMOPP.PRESSREGTEST.P) (detail)

192.605(b)(1) (192.739(a); 192.739(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Pressure Telemetry or Recording Gauges (detail) Does the process require telemetry or recording gauges be utilized as required for distribution systems? (MO.GMOPP.PRESSREGMETER.P) (detail)

192.605(b)(1) (192.741(a); 192.741(b); 192.741(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in plan.

3. Pressure Limiting and Regulating Stations Capacity of Relief Devices (detail) Does the process include procedures for ensuring, either by testing or a review of calculations, at intervals not exceeding 15 months, but at least once each calendar year, that the capacity of each pressure relief device at pressure limiting stations and pressure regulating stations has sufficient capacity, and for installing a new or additional device if a relief device is determined to have insufficient capacity? (MO.GMOPP.PRESSREGCAP.P) (detail)

192.605(b)(1) (192.743(a); 192.743(b); 192.743(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Valve and Vault Maintenance

1. Valve Maintenance Transmission Lines (detail) Does the process include procedures for inspecting and partially operating each transmission line valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable? (MO.GM.VALVEINSPECT.P) (detail)

192.605(b)(1) (192.745(a); 192.745(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Valve Maintenance Distribution Lines (detail) Does the process include procedures for inspecting and partially operating each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable? (MO.GM.DISTVALVEINSPECT.P) (detail)

192.605(b)(1) (192.747(a); 192.747(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3 above ground valves 10 below ground valves. No records available on inspections. William Bay is a contractor who helps inspect valves. No OQ training records were available.

Procedures - Vault Inspection

1. Vault Inspection (detail) Does the process provide adequate direction for inspecting vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment and are inspections to be performed at the required interval? (FS.FG.VAULTINSPECTFAC.P) (detail)

192.605(b)(1) (192.749(a); 192.749(b); 192.749(c); 192.749(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Prevention of Accidental Ignition

1. Prevention of Accidental Ignition (detail) Does the manual include procedures for minimizing the danger of accidental ignition where gas constitutes a hazard of fire or explosion? (MO.GM.IGNITION.P) (detail)

192.605(b)(1) (192.751(a); 192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Caulked Bell and Spigot Joints

1. Bell and Spigot Joints (detail) Does the process require that caulked bell and spigot joints be correctly sealed?
(MO.GM.BELLSPIGOTJOINT.P) (detail)

192.753(a) (192.753(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Protecting Cast-Iron Pipeline

1. Protecting Cast-Iron Pipeline (detail) Does the process require adequate protection for segments of a buried cast-iron pipeline for which support has been disturbed? (MO.GM.CASTIRONPROTECT.P) (detail)

192.755(a) (192.755(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Welding and Weld Defect Repair/Removal

1. Welding Procedures (detail) Does the process require welding to be performed by qualified welders using qualified welding procedures and are welding procedures and qualifying tests required to be recorded in detail?
(DC.WELDPROCEDURE.WELD.P) (detail)

192.225(a) (192.225(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes
No welding procedures. System is all plastic.

*** 2. Qualification of Welders (detail)** Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code? (TQ.QUOMCONST.WELDER.P) (detail)

192.227(a) (192.225(a); 192.225(b); 192.328(a); 192.328(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

3. Qualification of Welders for Low Stress Pipe (detail) Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192? (TQ.QUOMCONST.WELDERLOWSTRESS.P) (detail)

192.227(b) (192.225(a); 192.225(b); 192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Limitations on Welders (detail) Does the process require certain limitations be placed on welders? (DC.WELDERQUAL.WELDERLIMITNDT.P) (detail)

192.303 (192.229(a); 192.229(b); 192.229(c); 192.229(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

5. Welding Weather (detail) Does the process require welding to be protected from weather conditions that would impair the quality of the completed weld? (DC.WELDPROCEDURE.WELDWEATHER.P) (detail)

192.303 (192.231)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

6. Miter joints (detail) Does the process prohibit the use of certain miter joints? (DC.WELDPROCEDURE.MITERJOINT.P) (detail)

192.303 (192.233(a); 192.233(b); 192.233(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Preparation for Welding (detail) Does the process require certain preparations for welding, in accordance with §192.235? (DC.WELDPROCEDURE.WELDPREP.P) (detail)

192.303 (192.235)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

8. Inspection and Test of Welds (detail) Does the process require visual inspections of welds to be conducted by qualified inspectors? (DC.WELDINS.P.WELDVISUALQUAL.P) (detail)

192.303 (192.241(a); 192.241(b); 192.241(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

9. Repair or Removal of Weld Defects (detail) Does the process require welds that are unacceptable to be removed and/or repaired as specified by 192.245? (DC.WELDINS.P.WELDREPAIR.P) (detail)

192.303 (192.245(a); 192.245(b); 192.245(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Nondestructive Testing

1. Nondestructive Test and Interpretation Procedures (detail) Is there a process for nondestructive testing and interpretation? (DC.WELDINS.P.WELDNDT.P) (detail)

192.243(a) (192.243(b); 192.243(c); 192.243(d); 192.243(e).)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Joining of Pipeline Materials

1. Plastic Pipe Joints (detail) Does the process require plastic pipe joints to be designed and installed in accordance with 192.281? (DC.CO.PLASTICJOINT.P) (detail)

192.303 (192.273(b); 192.281(a); 192.281(b); 192.281(c); 192.281(d); 192.281(e))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
William Bay is making repairs on the pipeline by fusion...no records were available.

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

2. Plastic pipe - Qualifying Joining Procedures (detail) Does the process require plastic pipe joining procedures to be qualified in accordance with §192.283, prior to making plastic pipe joints? (DC.CO.PLASTICJOINTPROCEDURE.P) (detail)

192.273(b) (192.283(a); 192.283(b); 192.283(c); 192.283(d))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan.

3. Plastic pipe - Qualifying Joining Procedures (detail) Is a process in place to ensure that personnel making joints in plastic pipelines are qualified? (DC.CO.PLASTICJOINTQUAL.P) (detail)

192.285(d) (192.285(a); 192.285(b); 192.285(c); 192.805)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan.

4. Qualification of Personnel Inspecting Joints in Plastic Pipelines (detail) Is a process in place to assure that persons who inspect joints in plastic pipes are qualified? (DC.CO.PLASTICJOINTINSP.P) (detail)

192.287 (192.805(h))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in Plan.

Procedures - Corrosion Control

1. Corrosion Control Personnel Qualification (detail) Does the process require corrosion control procedures to be carried out by, or under the direction of, qualified personnel? (TQ.QU.CORROSION.P) (detail)

192.453 (192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. New Buried Pipe Coating (detail) Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with an adequate coating unless exempted by §192.455(b)? (TD.COAT.NEWPIPE.P) (detail)

192.605(b)(2) (192.455(a); 192.461; 192.463; 192.483(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

3. Conversion to Service - Pipe Coating (detail) Does the process require that each buried or submerged pipeline that has been converted to gas service and was installed after July 31, 1971, be protected against external corrosion with an adequate coating unless exempted by 192.455(b)? (TD.COAT.CONVERTPIPE.P) (detail)

192.605(b)(2) (192.452(a); 192.455(a); 192.455(b); 192.461(a))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in plan.

4. Cathodic Protection post July 1971 (detail) Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering? (TD.CP.POST1971.P) (detail)

192.605(b)(2) (192.455(a); 192.457(a); 192.452(a); 192.452(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in Plan.

5. Use of Aluminum (detail) Does the process give adequate guidance for the installation of aluminum in a submerged or buried pipeline? (TD.CP.ALUMINUM.P) (detail)

192.605(b)(2) (192.455(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

6. Cathodic Protection pre August 1971 (detail) Does the process require that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines or 2) bare or coated pipes in compressor, regulator or meter stations must be cathodically protected in areas where active corrosion is found in accordance with Subpart I or Part 192? (TD.CP.PRE1971.P) (detail)

192.605(b)(2) (192.457(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in plan.

7. Examination of Exposed Portions of Buried Pipe (detail) Does the process require that exposed portions of buried pipeline must be examined for external corrosion? (TD.CPEXPOSED.EXPOSEINSPECT.P) (detail)

192.605(b)(2) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

8. Further Examination of Exposed Portions of Buried Pipe (detail) Does the process require further examination of exposed buried pipe if corrosion is found? (TD.CPEXPOSED.EXPOSECORRODE.P) (detail)

192.605(b)(2) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Cathodic Protection Monitoring Criteria (detail) Does the process require CP monitoring criteria to be used that is acceptable? (TD.CPEXPOSED.MONITORCRITERIA.P) (detail)

192.605(b)(2) (192.463(a); 192.463(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Cathodic Protection of Amphoteric Metals (detail) Does the process describe criteria to be used for cathodic protection of amphoteric metals (aluminum) that are included in a steel pipeline? (TD.CP.AMPHOTERIC.P) (detail)

192.605(b)(2) (192.463(b); 192.463(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

11. Cathodic Protection Monitoring (detail) Does the process adequately describe how to monitor CP that has been applied to pipelines? (TD.CP.MONITOR.TEST.P) (detail)

192.605(b)(2) (192.465(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

12. Rectifiers or other Impressed Current Sources (detail) Does the process give sufficient details for making electrical checks of rectifiers or impressed current sources? (TD.CP.MONITOR.CURRENTTEST.P) (detail)

192.605(b)(2) (192.465(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes
Operator has no rectifiers or anodes.

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

13. Bonds, Diodes and Reverse Current Switches (detail) Does the process give sufficient details for making electrical checks of interference bonds, diodes, and reverse current switches? (TD.CP.MONITOR.REVCURRENTTEST.P) (detail)

192.605(b)(2) (192.465(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

14. Correction of Corrosion Control Deficiencies (detail) Does the process require that the operator correct any identified deficiencies in corrosion control? (TD.CP.MONITOR.DEFICIENCY.P) (detail)

192.605(b)(2) (192.465(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

15. Unprotected Buried Pipelines (typically bare pipelines) (detail) Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection? (TD.CP.UNPROTECT.P) (detail)

192.605(b)(2) (192.465(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

16. Isolation from Other Metallic Structures (detail) Does the process give adequate guidance for electrically isolating each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit? (TD.CP.ELECISOLATE.P) (detail)

192.605(b)(2) (192.467(a); 192.467(b); 192.467(c);
192.467(d); 192.467(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

17. Test Leads Installation (detail) Does the process provide adequate instructions for the installation of test leads? (TD.CP.MONITOR.TESTLEAD.P) (detail)

192.605(b)(2) (192.471(a); 192.471(b); 192.471(c); 192.469)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

18. Interference Currents (detail) Does the process give sufficient guidance and detail for identifying areas of potential stray current so the detrimental effects of stray currents can be minimized through a continuing program? (TD.CPMONITOR.INTFRCURRENT.P) (detail)

192.605(b)(2) (192.473(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

19. Internal Corrosion (detail) If the process does not preclude corrosive gas to be transported by pipeline, does the process also require that the corrosive effect of the gas on the pipeline be investigated and steps be taken to minimize internal corrosion? (TD.ICP.CORRGAS.P) (detail)

192.605(b)(2) (192.475(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

20. Internal Corrosion in Cutout Pipe (detail) Does the process direct personnel to examine removed pipe for evidence of internal corrosion? (TD.ICP.EXAMINE.P) (detail)

192.605(b)(2) (192.475(a); 192.475(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

21. Internal Corrosion Control: Design and Construction (192.476) (detail) Does the process require that the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of §192.476? (DC.DPC.INTCORRODE.P) (detail)

192.453 (192.476(a); 192.476(b); 192.476(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

22. Internal Corrosion Corrosive Gas Actions (detail) Does the process give adequate direction for actions to be taken if corrosive gas is being transported by pipeline? (TD.ICP.CORRGASACTION.P) (detail)

192.605(b)(2) (192.477)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan.

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

23. Atmospheric Corrosion (detail) Does the process give adequate guidance for protecting above ground pipe from atmospheric corrosion? (TD.ATM.ATMCORRODE.P) (detail)

192.605(b)(2) (192.479(a); 192.479(b); 192.479(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

24. Atmospheric Corrosion Monitoring (detail) Does the process give adequate instruction for the inspection of aboveground pipeline segments for atmospheric corrosion? (TD.ATM.ATMCORRODEINSP.P) (detail)

192.605(b)(2) (192.481(a); 192.481(b); 192.481(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

25. Repair of Corroded Pipe (detail) Does the process give sufficient guidance for personnel to repair or replace pipe that has corroded to an extent that there is no longer sufficient remaining strength in the pipe wall? (AR.RCOM.REPAIR.P) (detail)

192.491(c) (192.485(a); 192.485(b); 192.487(a); 192.487(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

26. Evaluation of Internally Corroded Pipe (detail) Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded? (TD.ICP.EVALUATE.P) (detail)

192.605(b)(2) (192.485(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

27. Graphitization of Cast Iron and Ductile Iron (detail) Does the process give adequate guidance for remediation of graphitization of cast iron or ductile iron pipe? (TD.CP.GRAPHITIZE.P) (detail)

192.605(b)(2) (192.489(a); 192.489(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

28. Corrosion Control Records (detail) Does the process include records requirements for the corrosion control activities listed in 192.491? (TD.CP.RECORDS.P) (detail)

192.605(b)(2) (192.491(a); 192.491(b); 192.491(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Field Review - Pipeline Inspection (Field)

1. Transmission Line Valve Spacing (detail) Are transmission line valves being installed as required of 192.179? (DC.DPC.VALVESPACE.O) (detail)

192.141 (192.179(a); 192.179(b); 192.179(c); 192.179(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Cathodic Protection Monitoring Criteria (detail) Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria? (TD.CPMONITOR.MONITORCRITERIA.O) (detail)

192.463(a)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

3. Rectifier or other Impressed Current Sources (detail) Are impressed current sources properly maintained and are they functioning properly? (TD.CPMONITOR.CURRENTTEST.O) (detail)

192.465(b)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Internal Corrosion Control: Design and Construction (192.476) (detail) Does the transmission project's design and construction comply with 192.476? (DC.DPC.INTCORRODE.O) (detail)

192.476(a) (192.476(b); 192.476(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

5. Atmospheric Corrosion Monitoring (detail) *Is pipe that is exposed to atmospheric corrosion protected?*
(TD.ATM.ATMCORRODEINSP.O) (detail)

192.481(b) (192.481(c); 192.479(a); 192.479(b); 192.479(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Not checking for atmospheric corrosion

6. Normal Operations and Maintenance Procedures - Review (detail) *Are operator personnel knowledgeable of the procedures used in normal operations?* (MO.GO.OMEFFECTREVIEW.O) (detail)

192.605(b)(8)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Placement of ROW Markers (detail) *Are line markers placed and maintained as required?*
(PD.RW.ROWMARKER.O) (detail)

192.707(a) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Several line markers were faded and hard to read and did not appear to be placed at all road crossings.

8. Placement of ROW Markers (detail) *Are line markers placed and maintained as required for above ground pipelines?* (PD.RW.ROWMARKERABOVE.O) (detail)

192.707(c) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Transmission Lines Testing of Repairs (detail) *Does the operator properly test replacement pipe and repairs made by welding on transmission lines?* (AR.RMP.WELDTTEST.O) (detail)

192.719(a) (192.719(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

10. Pressure Telemetry or Recording Gauges (detail) *Are telemetry or recording gauges properly utilized as required for distribution systems? (MO.GMOPP.PRESSREGMETER.O) (detail)*

192.741(a) (192.741(b); 192.741(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

No recording gages.

11. Pressure Limiting and Regulating Stations Inspection and Testing (detail) *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate? (MO.GMOPP.PRESSREGTEST.O) (detail)*

192.739(a) (192.739(b); 192.743)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No records were provided to show regulator inspections.

12. Valve Maintenance Transmission Lines (detail) *Are field inspection and partial operation of transmission line valves adequate? (MO.GM.VALVEINSPECT.O) (detail)*

192.745(a) (192.745(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

13. Prevention of Accidental Ignition (detail) *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition. (AR.RMP.IGNITION.O) (detail)*

192.751(a) (192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Records - Regulatory Reporting Performance

1. Immediate Reporting: Incidents (detail) *Do records indicate immediate notifications of incidents were made in accordance with 191.5? (RPT.RR.IMMEDREPORT.R) (detail)*

191.5(a) (191.7(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

No incident records were provided.

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

2. Incident Reports (detail) Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.2 (01-2002) within the required timeframe? (RPT.RR.INCIDENTREPORT.R) (detail)

191.15(a)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

3. Supplemental Incident Reports (detail) Do records indicate accurate supplemental incident reports were filed and within the required timeframe? (RPT.RR.INCIDENTREPORTSUPP.R) (detail)

191.15(c)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Annual Report Records (detail) Have complete and accurate Annual Reports been submitted? (RPT.RR.ANNUALREPORT.R) (detail)

191.17(a)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No annual reports have been made.

5. Safety Related Condition Reports (detail) Do records indicate safety-related condition reports were filed as required? (RPT.RR.SRCR.R) (detail)

191.23(a) (191.25(a); 191.25(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

6. Customer Notification (detail) Do records indicate the customer notification process satisfies the requirements of 192.16? (MO.GO.CUSTNOTIFY.R) (detail)

192.16(d) (192.16(a); 192.16(b); 192.16(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No records were provided for this requirement.

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

7. NPMS: Abandoned Underwater Facility Reports (detail) Do records indicate reports were filed for abandoned offshore pipeline facilities or abandoned onshore pipeline facilities that crosses over, under or through a commercially navigable waterway? (RPT.RR.NPMSABANDONWATER.R) (detail)

192.727(g)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Records - Construction Performance

1. Welding Procedures (detail) Do records indicate weld procedures are being qualified in accordance with 192.225? (DC.WELDPROCEDURE.WELD.R) (detail)

192.225(a) (192.225(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes
Operator has an all plastic system

2. Qualification of Welders (detail) Do records indicate adequate qualification of welders? (TQ.QUOMCONST.WELDER.R) (detail)

192.227(a) (192.227(b); 192.229(a); 192.229(b); 192.229(c); 192.229(d); 192.328(a); 192.328(b); 192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

3. Inspection and Test of Welds (detail) Do records indicate that individuals who perform visual inspection of welding are qualified by appropriate training and experience, as required by §192.241(a)? (DC.WELDINSP.WELDVISUALQUAL.R) (detail)

192.241(a) (192.241(b); 192.241(c); 192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Qualification of Nondestructive Testing Personnel (detail) Do records indicate the qualification of nondestructive testing personnel? (TQ.QUOMCONST.NDT.R) (detail)

192.243(b)(2) (192.807(a); 192.807(b); 192.328(a); 192.328(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

5. Nondestructive Test and Interpretation Procedures (detail) *Do records indicate that NDT implementation is adequate?* (DC.WELDINSP.WELDNDT.R) (detail)

192.243(a) (192.243(b)(1); 192.243(b)(2); 192.243(c); 192.243(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

6. Transmission Lines Record Keeping (detail) *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?* (MO.GM.RECORDS.R) (detail)

192.605(b)(1) (192.243(f); 192.709(a); 192.709(b); 192.709(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Plastic pipe - Qualifying Joining Procedures (detail) *Have plastic pipe joining procedures been qualified in accordance with 192.283?* (DC.CO.PLASTICJOINTPROCEDURE.R) (detail)

192.273(b) (192.283(a); 192.283(b); 192.283(c); 192.283(d))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No plastic pipe joining procedures were in the O&M plan.

8. Plastic pipe - Qualifying Joining Procedures (detail) *Do records indicate persons making joints in plastic pipelines are qualified in accordance with 192.285?* (DC.CO.PLASTICJOINTQUAL.R) (detail)

192.285(d) (192.285(a); 192.285(b); 192.285(c); 192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Contractor William Bays was qualified to join pipe. However not to Pollitt's plan...(no plan)

9. Qualification of Personnel Inspecting Joints in Plastic Pipelines (detail) *Do records indicate persons inspecting the making of plastic pipe joints have been qualified?* (DC.CO.PLASTICJOINTINSR.R) (detail)

192.287 (192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

10. Underground Clearance (detail) Do records indicate pipe is installed with clearances in accordance with 192.325, and (if plastic) installed as to prevent heat damage to the pipe? (DC.CO.CLEAR.R) (detail)

192.325(a) (192.325(b); 192.325(c))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

11. Depth of Cover - Onshore (detail) Is onshore piping minimum cover as specified in 192.327? (DC.CO.COVER.R) (detail)

192.327(a) (192.327(b); 192.327(c); 192.327(d); 192.327(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

12. EFV Installation (detail) Do records indicate the EFV program satisfies the requirements for installation and performance? (MO.GO.EFVINSTALL.R) (detail)

192.383(b) (192.381(a); 192.381(b); 192.381(c); 192.381(d); 192.381(e); 192.383(a); 192.383(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No records were provided of any EFV's installed or were there any requirements in the O&M manual.

13. Cathodic Protection post July 1971 (detail) Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering? (TD.CP.POST1971.R) (detail)

192.491(c) (192.455(a); 192.457(a); 192.452(a); 192.452(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Records - Operations and Maintenance Performance

1. Strength Test Requirements for SMYS > 30%. (detail) *Is pressure testing conducted in accordance with 192.505? (DC.PT.PRESSTESTHIGHSTRESS.R) (detail)*

192.517(a) (192.505(a); 192.505(b); 192.505(c); 192.505(d); 192.505(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Strength Test Duration Requirements for SMYS < 30% (detail) *Do records indicate that pressure testing is conducted in accordance with 192.507? (DC.PTLOWPRESS.PRESSTESTLOWSTRESS.R) (detail)*

192.517(a) (192.507(a); 192.507(b); 192.507(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

3. Strength Test Requirements for Operations < 100 psig (detail) *Do records indicate that pressure testing is conducted in accordance with 192.509(a)? (DC.PTLOWPRESS.PRESSTEST100PSIG.R) (detail)*

192.517(a) (192.509(a); 192.509(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Test Requirements for Plastic Pipe (detail) *Do records indicate that pressure testing is conducted in accordance with 192.513? (DC.PT.PRESSTESTPLASTIC.R) (detail)*

192.517(a) (192.513(a); 192.513(b); 192.513(c); 192.513(d))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No pressure test records of any kind were provided.

5. Normal Maintenance and Operations (detail) *Has the operator conducted annual reviews of the written procedures in the manual as required? (MO.GO.OMANNUALREVIEW.R) (detail)*

192.605(a)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

O&M and Emergency plan was written in 2002 and no updates have been made since.

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

6. Normal Operations and Maintenance Procedures - History (detail) Are construction records, maps and operating history available to appropriate operating personnel? (MO.GO.OMHISTORY.R) (detail)

192.605(a) (192.605(b)(3))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

No construction records were provided but the operator did have a map of the system. (not very detailed) Operator stated that no new construction had been performed in a number of years.

7. Normal Operations and Maintenance Procedures - Review (detail) Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operations and maintenance and modifying the procedures when deficiencies are found? (MO.GO.OMEFFECTREVIEW.R) (detail)

192.605(a) (192.605(b)(8))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No records were provided for this.

8. Abnormal Operations (Review) (detail) Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation procedures and corrective action taken where deficiencies are found? (MO.GO.ABNORMAL.ABNORMALREVIEW.R) (detail)

192.605(a) (192.605(c)(4))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No records were provided for this.

9. Damage Prevention Program (detail) Does the damage prevention program meet minimum requirements specified in 192.614(c)? (PD.OC.PDPROGRAM.R) (detail)

192.614(c)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Operator has no damage prevention plan and is not a member of KY-811

10. Change in Class Location Required Study (detail) Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location? (MO.GO.CLASS.CLASSLOCATESTUDY.R) (detail)

192.605(b)(1) (192.609(a); 192.609(b); 192.609(c); 192.609(d); 192.609(e); 192.609(f))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No records were provided for this.

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

11. Emergency Response Performance (detail) *Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency? (EP.ERG.POSTEVTREVIEW.R) (detail)*

192.605(a) (192.615(b)(1); 192.615(b)(3))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes
No records were provided for this.

12. Emergency Response Training (detail) *Has the operator trained the appropriate operating personnel on emergency procedures and verified that the training was effective in accordance with its procedures? (EP.ERG.TRAINING.R) (detail)*

192.605(a) (192.615(b)(2))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes
No records were provided for this.

13. Liaison with Public Officials (detail) *Do records indicate liaison established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures? (EP.ERG.LIAISON.R) (detail)*

192.605(a) (192.615(c)(1); 192.615(c)(2); 192.615(c)(3);
192.615(c)(4); ADB-05-03)

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes
No records were provided for this.

14. Incident Investigation (detail) *Do records indicate actions initiated to analyze accidents and failures, including the collection of appropriate samples for laboratory examination to determine the causes of the failure and minimize the possibility of recurrence, in accordance with its procedures? (EP.ERG.INCIDENTANALYSIS.R) (detail)*

192.605(a) (192.617)

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes
There were no records provided to verify this requirement.

15. General - Testing Requirements (detail) *Do records indicate that pressure testing is conducted in accordance with 192.503? (DC.PT.PRESSTEST.R) (detail)*

192.503(a) (192.503(b); 192.503(c); 192.503(d))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes
No pressure test records were provided.

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

16. Audience Identification Records (detail) Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages? (PD.PA.AUDIENCEID.R) (detail)

192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; API RP 1162 Section 3)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No PAP plan.

17. Educational Provisions (detail) Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a gas pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event? (PD.PA.EDUCATE.R) (detail)

192.616(d) (192.616(f))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No PAP plan.

18. Maximum Allowable Operating pressure (detail) Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required? (MO.GOMAOP.MAOPDETERMINE.R) (detail)

192.709 (192.619; 192.621; 192.623)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No MAOP records were supplied.

19. Messages on Pipeline Facility Locations (detail) Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations? (PD.PA.LOCATIONMESSAGE.R) (detail)

192.616(e) (192.616(f))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No PAP .

20. Odorization of Gas (detail) Do records indicate appropriate odorization of its combustible gases in accordance with its procedures and conduct of the required testing to verify odorant levels met requirements? (MO.GOODOR.ODORIZE.R) (detail)

192.709(c) (192.625(a); 192.625(b); 192.625(c); 192.625(d); 192.625(e); 192.625(f))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No odor tests have been performed using an instrument.

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

21. Baseline Message Delivery Frequency (detail) *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3? (PD.PA.MESSAGEFREQUENCY.R) (detail)*

192.616(c) (API RP 1162 Table 2-1; API RP 1162 Table 2-2; API RP 1162 Table 2-3)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No PAP.

22. Patrolling Requirements (detail) *Do records indicate that ROW surface conditions have been patrolled as required? (PD.RW.PATROL.R) (detail)*

192.709(c) (192.705(a); 192.705(b); 192.705(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Only 1 patrol is performed each year and 2 is required.

23. Liaison with Emergency and Other Public Officials (detail) *Have liaisons been established and maintained with appropriate fire, police, and other public officials? (PD.PA.LIAISON.R) (detail)*

192.616(c) (API RP 1162 Section 4.4)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
The operator said he has met with the local fire departments.

24. Leakage Surveys (detail) *Do records indicate leakage surveys conducted as required? (PD.RW.LEAKAGE.R) (detail)*

192.709(c) (192.706; 192.706(a); 192.706(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
The leak survey instrument used is not generally considered an appropriate leak survey tool. It is considered a leak pinpoint device used on piping leaks. The operator does not have a combustible gas indicator "CGI" To grade leaks when they are found and for emergency response when an odor complaint is investigated to determine if an explosive condition exists. The same instrument mentioned above will not give a reading in the percentage of gas tested.

25. Other Languages (detail) *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas? (PD.PA.LANGUAGE.R) (detail)*

192.616(g) (API RP 1162 Section 2.3.1)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No PAP.

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

26. Distribution Leakage Surveys (detail) Do records indicate distribution leakage surveys were conducted as required? (PD.RW.DISTLEAKAGE.R) (detail)

192.603(b) (192.721(a); 192.721(b); 192.723(a); 192.723(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No leak survey records were provided.

27. Test Reinstated Service Lines (detail) From the review of records, did the operator properly test disconnected service lines? (AR.RMP.TESTREINSTATE.R) (detail)

192.603(b) (192.725(a), 192.725(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Operator says there has been no service lines cut. No tests have been made.

28. Evaluate Program Implementation (detail) Has an audit or review of the operator's program implementation been performed annually since the program was developed? (PD.PA.EVALIMPL.R) (detail)

192.616(c) (192.616(i); API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No PAP.

29. Acceptable Methods for Program Implementation Audits (detail) Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation? (PD.PA.AUDITMETHODS.R) (detail)

192.616(c) (192.616(i); API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No PAP.

30. Abandonment or Deactivation of Pipeline and Facilities (detail) Do records indicate pipelines were abandoned or deactivated as required? (MO.GM.ABANDONPIPE.R) (detail)

192.709(c) (192.727(a); 192.727(b); 192.727(c); 192.727(d); 192.727(e); 192.727(f); 192.727(g))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

No abandonments have been made.

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

31. Program Changes and Improvements (detail) *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)? (PD.PA.PROGRAMIMPROVE.R) (detail)*

192.616(c) (API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No PAP.

32. Pressure Limiting and Regulating Stations Inspection and Testing (detail) *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations as required and at the specified intervals? (MO.GMOPP.PRESSREGTEST.R) (detail)*

192.709(c) (192.739(a); 192.739(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No regulator inspection records were provided.

33. Evaluating Program Effectiveness (detail) *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program? (PD.PA.EVALEFFECTIVENESS.R) (detail)*

192.616(c) (API RP 1162 Section 8.4)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No PAP.

34. Pressure Limiting and Regulating Stations Capacity of Relief Devices (detail) *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required and a new or additional device installed if determined to have insufficient capacity? (MO.GMOPP.PRESSREGCAP.R) (detail)*

192.709(c) (192.743(a); 192.743(b); 192.743(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No capacity review records were provided.

35. Measure Program Outreach (detail) *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked? (PD.PA.MEASUREOUTREACH.R) (detail)*

192.616(c) (API RP 1162 Section 8.4.1)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No PAP.

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

36. Valve Maintenance Transmission Lines (detail) Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary? (MO.GM.VALVEINSPECT.R) (detail)

192.709(c) (192.745(a); 192.745(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

37. Measure Understandability of Message Content (detail) In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined? (PD.PA.MEASUREUNDERSTANDABILITY.R) (detail)

192.616(c) (API RP 1162 Section 8.4.2)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No PAP.

38. Valve Maintenance Distribution Lines (detail) Do records indicate proper inspection and partial operation of each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year, and prompt remedial action to correct any valve found inoperable? (MO.GM.DISTVALVEINSPECT.R) (detail)

192.603(b) (192.747)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Operator said that all the valves had been checked but no records were provided.

39. Vault Inspection (detail) Do records document inspections at the required interval of all vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment? (FS.FG.VAULTINSPECTFAC.R) (detail)

192.709(c) (192.749(a); 192.749(b); 192.749(c); 192.749(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes
No vaults.

40. Measure Desired Stakeholder Behavior (detail) In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited? (PD.PA.MEASUREBEHAVIOR.R) (detail)

192.616(c) (API RP 1162 Section 8.4.3)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No PAP.

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

41. Prevention of Accidental Ignition (detail) Do records indicate personnel followed procedures for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion? (MO.GM.IGNITION.R) (detail)

192.709 (192.751(a); 192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

42. Measure Bottom-Line Results (detail) Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? (PD.PA.MEASUREBOTTOM.R) (detail)

192.616(c) (API RP 1162 Section 8.4.4)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No PAP.

43. Bell and Spigot Joints (detail) Do records indicate that caulked bell and spigot joints were correctly sealed? (MO.GM.BELLSPIGOTJOINT.R) (detail)

192.603(b) (192.753(a); 192.753(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

44. Program Changes (detail) Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations? (PD.PA.CHANGES.R) (detail)

192.616(c) (API RP 1162 Section 2.7 (Step 12); API RP 1162 Section 8.5)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No PAP.

45. Master Meter and Petroleum Gas Systems (detail) Do records indicate the master meter or petroleum gas system operator has met the requirements of 192.616(j)? (PD.PA.MSTRMETER.R) (detail)

192.616(j) (192.616(h); API RP 1162 Section 2.7 (Step 12); API RP 1162 Section 8.5)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Records - Operator Qualification

1. Qualification Records for Personnel Performing Covered Tasks (detail) Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified? (TQ.OQ.RECORDS.R) (detail)

192.807(b)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No OQ plan

2. Contractor and Other Entity Qualification (detail) Are adequate records maintained for contractor personnel qualifications that contain the required elements? (TQ.OQ.CONTRACTOR.R) (detail)

192.807(a) (192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

The contractor was not qualified to the operators OQ plan. (operator had no OQ plan)

William Bays was qualified for 3 tasks by Industrial training services in 2013. Pressure testing, Installing meters & regulators and installing service lines.

Records - Corrosion Control Performance

1. Corrosion Control Records (detail) Do records indicate the location of all items listed in 192.491(a)? (TD.CP.RECORDS.R) (detail)

192.491(a)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Examination of Exposed Portions of Buried Pipe (detail) Do records adequately document that exposed buried piping was examined for corrosion? (TD.CPEXPOSED.EXPOSEINSPECT.R) (detail)

192.491(c) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

3. Cathodic Protection Monitoring (detail) Do records adequately document cathodic protection monitoring tests have occurred as required? (TD.CPMONITOR.TEST.R) (detail)

192.491(c) (192.465(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Rectifier or other Impressed Current Sources (detail) Do records document details of electrical checks of sources of rectifiers or other impressed current sources? (TD.CPMONITOR.CURRENTTEST.R) (detail)

192.491(c) (192.465(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

5. Bonds, Diodes and Reverse Current Switches (detail) Do records document details of electrical checks interference bonds, diodes, and reverse current switches? (TD.CPMONITOR.REVCURRENTTEST.R) (detail)

192.491(c) (192.465(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

6. Correction of Corrosion Control Deficiencies (detail) Do records adequately document actions taken to correct any identified deficiencies in corrosion control? (TD.CPMONITOR.DEFICIENCY.R) (detail)

192.491(c) (192.465(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Unprotected Buried Pipelines (typically bare pipelines) (detail) Do records adequately document the re-evaluation of buried pipelines with no cathodic protection for areas of active corrosion? (TD.CP.UNPROTECT.R) (detail)

192.491(c) (192.465(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

8. Isolation from Other Metallic Structures (detail) Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit? (TD.CP.ELECISOLATE.R) (detail)

192.491(c) (192.467(a); 192.467(b); 192.467(c); 192.467(d); 192.467(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

9. Test Leads Installation (detail) Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I? (TD.CP.MONITOR.TESTLEAD.R) (detail)

192.491(c) (192.471(a); 192.471(b); 192.471(c); 192.469)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

10. Interference Currents (detail) Do records document that the operator has minimized the detrimental effects of stray currents when found? (TD.CP.MONITOR.INTFRCURRENT.R) (detail)

192.491(c) (192.473(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

11. Internal Corrosion (detail) Do records document if corrosive gas is being transported by pipeline, including the investigation of the corrosive effect of the gas on the pipeline and steps that have been taken to minimize internal corrosion? (TD.ICP.CORRGAS.R) (detail)

192.491(c) (192.475(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

12. Internal Corrosion in Cutout Pipe (detail) Do records document examination of removed pipe for evidence of internal corrosion? (TD.ICP.EXAMINE.R) (detail)

192.491(c) (192.475(a); 192.475(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

13. Internal Corrosion Control: Design and Construction (192.476) (detail) Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476? (DC.DPC.INTCORRODE.R) (detail)

192.476(a) (192.476(b); 192.476(c); .476(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

14. Internal Corrosion Corrosive Gas Actions (detail) Do records document the actions taken when corrosive gas is being transported by pipeline? (TD.ICP.CORRGASACTION.R) (detail)

192.491(c) (192.477)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

15. Atmospheric Corrosion Monitoring (detail) Do records document inspection of aboveground pipe for atmospheric corrosion? (TD.ATM.ATMCORRODEINSP.R) (detail)

192.491(c) (192.481(a); 192.481(b); 192.481(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No atmospheric have been performed.

16. New Buried Pipe Coating (detail) Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with an adequate coating unless exempted under 192.455(b)? (TD.COAT.NEWPIPE.R) (detail)

192.491(c) (192.455(a)(1); 192.461(a); 192.461(b); 192.483(a))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
The operator has an all plastic system however, There is a "Drip" and an above ground valve installed that is bare steel that has no cathodic protection.

17. Repair of Internally Corroded Pipe (detail) Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall? (TD.ICP.REPAIR.R) (detail)

192.485(a) (192.485(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

18. Evaluation of Internally Corroded Pipe (detail) *Do records document adequate evaluation of internally corroded pipe? (TD.ICP.EVALUATE.R) (detail)*

192.491(c) (192.485(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures (Distribution Compressor Station) - Compressor Station

1. Compressor Station Design/Construction - Maintenance (detail) *Does the process have sufficient detail for maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service? (FS.CS.CMPMAINT.P) (detail)*

192.605(b)(6)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes
None.

2. Compressor Station Design/Construction - Start-Up and Shut-Down (detail) *Does the process for start-up and shut-down have sufficient detail to ensure start-up and shut-down of compressor units in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices? (FS.CS.CMPSUSD.P) (detail)*

192.605(b)(5) (192.605(b)(7))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

3. Compressor Station Design/Construction - Pressure Relief (detail) *Does the process provide adequate detail for inspection and testing of compressor station pressure relief devices with the exception of rupture disks? (FS.CSSYSROT.CMPRELIEF.P) (detail)*

192.605(b)(1) (192.731(a); 192.731(b); 192.731(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

4. Compressor stations - Storage of Combustible Materials (detail) *Does the process include requirements for the storage of flammable/combustible materials and specify that aboveground oil or gasoline storage tanks being installed at compressor stations be protected in accordance with NFPA No. 30, as required of §192.735(b)?*
(DC.COCMP.CMPCOMBUSTIBLE.P) (detail)

192.303 (192.735(a); 192.735(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

5. Compressor Station Design/Construction - Permanent Gas Detection (detail) *Does the process adequately detail requirements of permanent gas detectors and alarms at compressor buildings?*
(FS.CSSYSROT.CMPGASDETREQ.P) (detail)

192.605(b) (192.736(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Field Review (Distribution Compressor Station) - Compressor Stations Inspection (Field)

1. Compressor Station Design/Construction - Exits (detail) *Does each main compressor building operating floor have at least two separated, easily accessed and unobstructed exits to a place of safety, main compressor building exits that have door latches that can be readily opened without a key, and main compressor building exit doors mounted to swing outward?*
(FS.CS.BLDGEXITS.O) (detail)

192.163(c)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Compressor Station Design/Construction - Fence Gates (detail) *Do fenced areas around compressor stations have at least two gates that provide for easy escape to place of safety, and do gates located within 200 feet of any compressor plant open outward and able to be opened from the inside without a key when the station is occupied?*
(FS.CS.FENCEGATES.O) (detail)

192.163(d)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

3. Compressor Station Design/Construction - NFPA 70 (detail) *Are the proper permits and approvals authorized under NFPA 70 posted or otherwise located at the compressor station? (FS.CS.CMPNFPA70.O) (detail)*

192.163(e)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Compressor stations Liquid Removal (detail) *Are compressors protected from liquids and, as applicable, liquid separators for compressors installed, in accordance with 192.165? (DC.DPCCMP.CMPLIQPROT.O) (detail)*

192.141 (192.165(a); 192.615(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

5. Compressor Station Design/Construction - ESD Gas Discharge (detail) *Does each compressor station have an emergency shutdown system that is capable of safely discharging blowdown gas from the blowdown piping at a location where the gas will not create a hazard? (FS.CSSYSROT.ESDGASDISCH.O) (detail)*

192.167(a)(2)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

6. Compressor Station Design/Construction - ESD Gas Block (detail) *Does each compressor station have an emergency shutdown system that is capable of blocking gas out of the station and blow down the station piping? NOTE: Not required for field compressor stations of 1,000 horsepower (746 kilowatts) or less. (FS.CSSYSROT.ESDGASBLK.O) (detail)*

192.167(a)(1)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Compressor Station Design/Construction - ESD (detail) *Does each compressor station have an emergency shutdown system that is capable of shutting down gas compressing equipment and gas fires in the vicinity of gas headers and compressor buildings? (FS.CSSYSROT.ESDGASSD.O) (detail)*

192.167(a)(3)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

8. Compressor Station Design/Construction - ESD Electrical (detail) Does each compressor station have an emergency shutdown system that is capable of shutting down electrical facilities (except emergency and equipment protection circuits) near gas headers and within compressor buildings? (FS.CSSYSROT.ESDELECSO) (detail)

192.167(a)(3)(i) (192.167(a)(3)(ii))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

9. Compressor Station Design/Construction - ESD Locations (detail) Does each compressor station have an emergency shutdown system that is capable of being operated from at least two locations which are: 1) Outside the gas area of the station, 2) Near the exit gates, if the station is fenced, or near emergency exits, if not fenced, 3) And not more than 500 feet (153 meters) from the limits of the station? (FS.CSSYSROT.ESDLOCATION.O) (detail)

192.167(a)(4)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

10. Compressor Station Design/Construction - Distribution Supply ESD (detail) Does each compressor station that supplies gas directly to a distribution system (with no other adequate sources of gas available) have an emergency shutdown system that will not function at the wrong time or cause unintended outages? (FS.CSSYSROT.ESDDISTSD.O) (detail)

192.167(b)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

11. Compressor Station Design/Construction - Unattended Platform ESD (detail) Does each unattended platform compressor station located offshore or in inland navigable waters have an emergency shutdown system that will actuate automatically in the event of the following occurrences? 1) When gas pressure equals the MAOP plus 15 percent and, 2) When an uncontrolled fire occurs on the platform. (FS.CSSYSROT.UNATTPLATCMPSD.O) (detail)

192.167(c)(1)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

12. Compressor Station Design/Construction - Fire Protection (detail) Do compressor stations have adequate fire protection facilities? (FS.CSSYSROT.CMPFP.O) (detail)

192.171(a)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

13. Compressor Station Design/Construction - Over-Speed Protection (detail) Do compressor stations' prime movers other than electrical induction or synchronous motors have automatic shutdown devices that will prevent over-speed of the prime mover or the unit being driven? (FS.CSSYSROT.CMPOVSPD.O) (detail)

192.171(b)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

14. Compressor Station Design/Construction - Lubrication (detail) Do compressor units have shutdown or alarm devices that will operate in the event of inadequate heating or lubrication? (FS.CSSYSROT.CMPLUBROT.O) (detail)

192.171(c)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

15. Compressor Station Design/Construction - Gas Engine Shutdown (detail) Are compressor station gas engines that operate with pressure gas injection equipped so that stoppage of the engine will result in the fuel being automatically shut off and the engine distribution manifold being vented? (FS.CSSYSROT.CMPGASENGSD.O) (detail)

192.171(d)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

16. Compressor Station Design/Construction - Gas Engine Mufflers (detail) Are gas engines in compressor stations equipped with mufflers that prevent gas from being trapped in the muffler? (FS.CSSYSROT.CMPGASENGMFL.O) (detail)

192.171(e)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

17. Compressor Station Design/Construction - Ventilation (detail) Are compressor station buildings ventilated to ensure employees are not endangered by accumulation of gas in enclosed areas? (FS.CS.CMPBLDGVENT.O) (detail)

192.173

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

18. Cathodic Protection of Underground Piping (detail) Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I or Part 192? (TD.CP.PRE1971.O) (detail)

192.457(b)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

19. Atmospheric Corrosion Monitoring (detail) Is pipe that is exposed to atmospheric corrosion protected? (TD.ATM.ATMCORRODEINSP.O) (detail)

192.481(b) (192.481(c); 192.479(a); 192.479(b); 192.479(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

20. Start-Stop Procedures (detail) During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded? (DC.MO.MAOPLIMIT.O) (detail)

192.605(b)(5)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

21. Normal Operations and Maintenance Procedures - History (detail) Are construction records, maps and operating history available to appropriate operating personnel? (MO.GO.OMHISTORY.O) (detail)

192.605(b)(3)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

22. Compressor Station - Emergency Response Plan (detail) Are emergency response plans for selected compressor stations kept on site? (FS.CS.CMPERP.O) (detail)

192.605(a) (192.615(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

23. MAOP Recording (detail) Do pressure recording charts or SCADA records indicate that maximum allowable operating pressure limits have been maintained in accordance with 192.619? (MO.GOMAOP.MAOPRECORDING.O) (detail)

192.605(b)(1) (192.619(a); 192.619(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

24. Placement of ROW Markers (detail) Are line markers placed and maintained as required?

(PD.RW.ROWMARKER.O) (detail)

192.707(a) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

25. Placement of ROW Markers (detail) Are line markers placed and maintained as required for above ground pipelines? (PD.RW.ROWMARKERABOVE.O) (detail)

192.707(c) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

26. Compressor Station Design/Construction - Pressure Relief (detail) Are pressure relief/limiting devices inside a compressor station designed, installed, and inspected properly? (FS.CSSYSROT.CMPRELIEF.O) (detail)

192.199 (192.731(a); 192.731(b); 192.731(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

27. Compressor stations - Storage of Combustible Materials (detail) Are flammable/combustible materials stored as required and aboveground oil or gasoline storage tanks installed at compressor stations protected in accordance with NFPA No. 30, as required by 192.735(b)? (DC.COCMP.CMPCOMBUSTIBLE.O) (detail)

192.735(a) (192.735(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

28. Compressor Station Gas Detection (detail) *Have adequate gas detection and alarm systems been installed in selected applicable compressor buildings? (FS.CSSYSROT.CMPGASDET.O) (detail)*

192.736(a) (192.736(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Records (Distribution Compressor Station) - Compressor Station O&M Performance

1. Compressor Station Design/Construction - Pressure Relief (detail) *Do records document with adequate detail that all inspection and testing of compressor station pressure relief devices with the exception of rupture disks have occurred at the required interval? (FS.CSSYSROT.CMPRELIEF.R) (detail)*

192.709(b) (192.709(c); 192.731(a); 192.731(b); 192.731(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Compressor Station Design/Construction - Gas Detection (detail) *Do records document that all compressor station gas detection and alarm systems are being maintained and tested as required? (FS.CSSYSROT.CMPGASDETM.R) (detail)*

192.709(c) (192.736(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Instructions

1. Use in conjunction with Unit inspections
2. Interview the primary operator contact for the Unit inspection you are conducting and enter their responses. Do not request the operator substance abuse expert to provide responses to these questions.
3. Send completed form to stanley.kastanas@dot.gov

Name of Operator		Op ID #	
Inspector		Unit #	
Date of Inspection			
Inspection Location City & State			
Operator Employee Interviewed		Phone #	
Position/Title			
Operator Designated Employer Representative (DER), (a.k.a. Substance Abuse Program Manager)			
DER Phone #			

§199	Pipeline Safety Regulations Drug and Alcohol Testing	Yes	No	Does Not Know
.3, .101 .201, .245	1. Does the company have a plan for drug and alcohol testing of employees and contractors performing, or ready to perform, covered functions of operations, maintenance, and emergency response?	X		
Comments				
.3 .105(c) .225(b)	2. Does the company perform random drug testing and reasonable suspicion drug and alcohol testing of employees performing covered functions? For random drug testing, enter the number of times per year employees are selected and the number of employees in each selection in Comments below.		X	
Comments				
.3 .105(b)	3. Does the company conduct post-accident/incident drug and alcohol testing for employees who have caused or contributed to the consequences of an accident/incident? Enter the position/title of the employee who would make the decision to conduct post-accident/incident testing in Comments below.	X		
Comments				
.113(c) .117(a)(4) .227(b)(2) .241	4. Does the company provide training for supervisors on the detection of potential drug abuse (minimum 60 minutes) and alcohol misuse (minimum 60 minutes)?		X	
Comments				
.3 .113(b) .117(a)(4) .239(b)(11)	5. Does the company give covered employees an explanation of the drug & alcohol policies and distribute information about the Employee Assistance Program, including a hotline number? Provide details in Comments below.			X
Comments				

Training and Qualification - Operator Qualification

1. Operator Qualification Plan and Covered Tasks (detail) *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks? (TQ.OQ.OQPLAN.P) (detail)*

192.805(a) (192.801(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Operators has no current training.

2. Reevaluation Intervals for Covered Tasks (detail) *Does the process establish and justify requirements for reevaluation intervals for each covered task? (TQ.OQ.REEVALINTERVAL.P) (detail)*

192.805(g)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

3. Contractors Adhering to OQ Plan (detail) *Does the process require the OQ plan to be communicated to contractors and ensure that contractors are following the plan? (TQ.OQ.OQPLANCONTRACTOR.P) (detail)*

192.805(b) (192.805(f); 192.805(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

4. Contractor and Other Entity Qualification (detail) *Does the process require contractor organizations or other entities that perform covered tasks on behalf of the operator to be qualified? (TQ.OQ.OQCONTRACTOR.P) (detail)*

192.805(b) (192.805(c); 192.855(d); 192.805(e); 192.805(f))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

6. Contractor and Other Entity Qualification (detail) *Are adequate records maintained for contractor personnel qualifications that contain the required elements? (TQ.OQ.OQCONTRACTOR.R) (detail)*

192.807(a) (192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Contractor William Bay had been OQ trained by industrial training services for 3 tasks by Industrial Training services in 2013. The operator did not have an OQ plan.

7. Management of Other Entities Performing Covered Tasks (detail) Do records document evaluation of the other entity (ies) performing covered task(s) on behalf of the operator (e.g., through mutual assistance agreements) prior to performing task? (TQ.OQ.OTHERENTITY.R) (detail)

192.805(b) (192.805(c); 192.803)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

8. Evaluation Methods (detail) Are evaluation methods established and documented appropriate to each covered task? (TQ.OQ.EVALMETHOD.P) (detail)

192.805(b) (192.803; 192.809(d); 192.809(e))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

9. Evaluation Methods (detail) Do records indicate evaluation methods are documented for covered tasks and consistent with personnel qualification records? (TQ.OQ.EVALMETHOD.R) (detail)

192.805(b) (192.803; 192.809(d); 192.809(e))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

10. Abnormal Operating Conditions (detail) Does the process require: 1) individuals performing covered tasks be qualified to recognize and react to abnormal operating conditions (AOCs), 2) evaluation and qualification of individuals for their capability to recognize and react to AOCs, 3) AOCs identified as those that the individual may reasonably anticipate and appropriately react to during the performance of the covered task, and 4) established provisions for communicating AOCs for the purpose of qualifying individuals? (TQ.OQ.ABNORMAL.P) (detail)

192.803

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

11. Abnormal Operating Conditions (detail) Do records document evaluation of qualified individuals for recognition and reaction to AOCs? (TQ.OQ.ABNORMAL.R) (detail)

192.807(a) (192.807(b); 192.803)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

12. Qualification Records for Personnel Performing Covered Tasks (detail) *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified? (TQ.OQ.RECORDS.R) (detail)*

192.807

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

13. Planning for Mergers and Acquisitions (Due Diligence re: Acquiring Qualified Individuals) (detail) *Does the process adequately manage qualifications of individuals performing covered tasks during program integration following a merger or acquisition? (TQ.OQ.MERGERACQ.P) (detail)*

192.805(b) (192.803)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

14. Training Requirements (Initial, Retraining, and Reevaluation) (detail) *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks? (TQ.OQ.TRAINING.P) (detail)*

192.805(h)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

16. Covered Task Performed by Non-Qualified Individual (detail) *Are there provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are there restrictions and limitations placed on such activities? (TQ.OQ.NONQUALIFIED.P) (detail)*

192.805(c)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

17. Personnel Performance Monitoring (detail) *Does the program include provisions to evaluate an individual if there is reason to believe the individual is no longer qualified to perform a covered task based on: covered task performance by an individual contributed to an incident or accident; other factors affecting the performance of covered tasks? (TQ.OQ.PERFMONITOR.P) (detail)*

192.805(d) (192.805(e))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

PHMSA Form 14 Question Set (IA Equivalent)
PHMSA (OQ) INSPECTION FORM

19. Program Performance and Improvement (detail) *Does the process require evaluation of the OQ program and implementation of improvements to enhance the effectiveness of the program?* (TQ.OQ.PROGRAMEVAL.P) (detail)

192.605(a) (192.605(b)(8))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

21. Management of Changes (detail) *Does the OQ program identify how changes to procedures, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?* (TQ.OQ.MOC.P) (detail)

192.805(f)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

22. Notification of Significant Plan Changes (detail) *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?* (TQ.OQ.CHANGENOTIFY.P) (detail)

192.805(i)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Training and Qualification - OQ Protocol 9

1. Covered Task Performance (detail) Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures. (TQ.PROT9.TASKPERFORMANCE.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

2. Qualification Status (detail) Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks. (TQ.PROT9.QUALIFICATIONSTATUS.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

3. Abnormal Operating Condition Recognition and Reaction (detail) Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed. (TQ.PROT9.AOCRECOG.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

4. Verification of Qualification (detail) Verify the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance. (TQ.PROT9.VERIFYQUAL.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

5. Program Inspection Deficiencies (detail) Have potential issues identified by the headquarters inspection process been corrected at the operational level? (TQ.PROT9.CORRECTION.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

PHMSA Form 15 Question Set (IA Equivalent)
PHMSA (OQ) FIELD INSPECTION FORM

Distribution Integrity Management Program Implementation Inspection Form

This inspection form is for the evaluation of an operator's implementation of its gas distribution integrity management program (DIMP) through a review of its records and actions performed on pipeline facilities. This inspection form is applicable to operators, other than Master Meter and Small LPG operators, that have developed and implemented a DIMP under §192.1005. The form asks inspectors to review records and perform field observations regarding the implementation of the DIMP required elements. Following a review of the operator's DIMP plan, inspectors will observe actions taken by the operator to ensure that procedures have been followed. There are instances when actions by an operator could be deemed satisfactory by an inspector for an implementation question while still not meeting the procedural requirements in the DIMP plan resulting in an unsatisfactory rating for a corresponding procedural question.

Questions with code references beside them are enforceable. "S/Y" stands for "satisfactory" or "yes"; "U/N" stands for "unsatisfactory" or "no"; "N/A" stands for "not applicable"; and "N/C" stands for "not checked". If an item is marked U/N, N/A, or N/C, an explanation must be included in the comments section. Due to the unique characteristics of some operator's system, there are instances where an operator is not required to perform an action, and some of the questions requesting a review of documents may not apply and would be rated as "N/A" (rather than rating "U/N"). For instance, in Question #8, if the operator has NOT acquired any new information relevant to threat identification, rate as "N/A". Correspondingly, if the operator had acquired new information that needed to be included in the threat identification and had not, then the rating would be "U/N".

This inspection form includes two types of activities – records review and field observation activities:

- The Records Review questions are to be performed on records used by an operator for implementing its DIMP plan. Not all parts of this form may be applicable to a specific Records Review Inspection, and only those applicable portions of this form need to be completed.
- The Field Observation questions are to be used on field activities being performed by an operator in support of its DIMP plan. Field Observation inspection activities may also include review of data, environmental conditions, and assumptions being used by an operator in support of its DIMP plan. Not all parts of this form may be applicable to a specific Field Observation Inspection, and only those applicable portions of this form need to be completed.

A review of applicable Operations and Maintenance (O&M) and DIMP processes and procedures applicable to the field activity being inspected should be considered by the inspector to ensure the operator is implementing its O&M Manuals and DIMP in a consistent manner.

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Operator Contact and System Information

Operator Information:

Name of Operator (legal entity):	
PHMSA Operator ID:	
Type of Operator:	<input type="checkbox"/> Investor Owned <input type="checkbox"/> Municipal <input type="checkbox"/> Private <input type="checkbox"/> LPG <input type="checkbox"/> Other (Identify - e.g., cooperative)
State(s) included in this inspection	
Headquarters Address:	
Company Contact:	
Phone Number:	
Email:	
Date(s) of Inspection	
Date of this Report	
Date of Current DIMP Plan/Revision	

Persons Interviewed:

Persons Interviewed <i>(list primary contact first)</i>	Title	Phone Number	Email

State/Federal Representatives:

Inspector Name and Agency	Phone Number	Email

System Description Narrative:

**PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0**

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
		192.1005	Issues Identified in previous Integrity Management Inspection(s)			
1	* - If not satisfactory, insert appropriate code section(s)	Have all issues raised in previous DIMP inspections been satisfactorily addressed? Provide comments below.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments		Operator had no DIMP Plan.				
		192.1007(a)	Knowledge of the system			
2	.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
3	.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data using the procedures prescribed in its DIMP plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
4	.1007 (a)(3)	Has the operator incorporated into the DIMP plan any new or missing information identified or acquired during normal operations, maintenance, and inspection activities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
5	.1007(a)(5)	Has the operator captured required data on any new pipeline installations? For pipe, fittings, valves, EFVs, risers, regulators, shut-offs, etc., examples of data and records required to be collected by operator since August 2, 2011 include, but are not limited to, the following: <ul style="list-style-type: none"> • Location • Material type and size • Wall thickness or SDR • Manufacturer • Lot or production number 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
6	.1007 (a)	Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed? Note: This question can be answered by office review of records and/or comparison of field conditions to information in the reviewed records.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
7	.1007 (a)	If new Subject Matter Experts (SMEs) input is incorporated into the DIMP plan, do SMEs have the necessary knowledge and/or experience (skills sets) regarding the areas of expertise for which the SME provided knowledge or supplemental information for input into the DIMP plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
8	.1007 (a)	Do operator personnel in the field understand their responsibilities under DIMP plan? (Below are possible questions for field personnel) <ul style="list-style-type: none"> • Would you explain what DIMP training you have received? • What instructions have you received to address the discovery of pipe or components not documented in the company records? • What instructions have you received if you find a possible issue? (ex: corrosion, dented pipe, poor fusion joints, missing coating, excavation damage, mechanical fitting failures) • If you find situations where the facilities examined (e.g., size of the pipe, coating) are different than records indicate, what documentation do you prepare? • If you are repairing a leak and find that a fitting was improperly installed, what documentation do you prepare? 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007 (b) and (c)	Identify Threats; Evaluate and Rank Risk				
9	.1007(b)	Has the operator acquired any new information relevant to system knowledge that may affect its threat identification?	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
10	.1007 (b)	Have any changes occurred that require re-evaluation of threats and risks? Examples include, but are not limited to, the following: <ul style="list-style-type: none"> • Acquisition of new systems • Completion of pipe replacement program • New threats (e.g., first time natural forces damage, etc.) • Increase in existing threats (e.g., washouts, land subsidence, etc.) • Increase in consequences (e.g., new wall-to-wall pavement, etc.) • Organization changes (e.g., downsizing of staff, company restructuring, etc.) • Applicable code revisions • Other (describe below) 	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
11	.1007 (b)	Has the operator identified information or data from external sources (e.g. trade associations, operator's consultants, government agencies, other operators, manufacturers, etc.) that may require re-evaluation of threats and risks?	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
12	.1007 (c)	Since the last DIMP plan review by the regulatory agency, has the operator updated its threat identification and risk assessment based on newly acquired information or data (see Questions 9, 10, and 11) relevant to system knowledge?	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

**PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0**

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007 (b) and (c)	Identify Threats; Evaluate and Rank Risk				
13	.1007 (c)	If the operator has modified its threat identification and risk evaluation and ranking, were the revisions made in accordance with the procedure in the operator's DIMP plan?	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
14	.1007 (c)	Does the operator's current subdivision process (grouping of materials, geographic areas, etc.) adequately meet the need to properly evaluate and rank the existing and potential threats to the integrity of its system?	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
15	.1007 (c)	Has the operator added or modified system subdivisions within its risk evaluation and ranking since the last plan review by the regulatory agency?	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
16	.1007 (c)	If the operator has added or modified system subdivisions, was it done in accordance with the procedures described in the operator's DIMP plan?	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
17	.1007 (c)	If the operator has added or modified system subdivisions, did the new system subdivision result in modifications to the risk evaluation and ranking?	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(d)	Identify and implement measures to address risks				
18	.1007 (d)	Does the documentation reviewed demonstrate the operator is implementing the measures to reduce risks per the DIMP plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19	.1007 (d)	Has the operator completed any measures to reduce risks resulting in the elimination/mitigation of the associated identified threat? (e.g., pipe replacement program completed, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
20	.1007 (d)	If answering "Satisfactory/Yes" to question 19, has the operator re-evaluated and ranked its risks (1007(c)) because of the elimination/mitigation of an identified threat to ensure that risk reduction measures in place are appropriate?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
21	.1007 (d)	Does each implemented risk reduction measure identified in the DIMP plan address a specific risk?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
22	.1007 (d)	Can the operator provide documentation to demonstrate that an effective leak management program is being implemented? Important components in an effective program include, but are not limited to, the following: <u>Locate</u> the leaks in the distribution system; <u>Evaluate</u> the actual or potential hazards associated with these leaks; <u>Act</u> appropriately to mitigate these hazards; <u>Keep</u> records; and <u>Self-assess</u> to determine if additional actions are necessary to keep people and property safe. Answer "N/A" if operator repairs all leaks when found.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(e)	Measure performance, monitor results, and evaluate effectiveness				
23	.1007 (e)	<p>Is the operator collecting data for the required performance measures in §192.1007(e)?</p> <p>i) Number of hazardous leaks either eliminated or repaired, categorized by cause? <input type="checkbox"/> S/Y <input checked="" type="checkbox"/> U/N <input type="checkbox"/> N/A <input type="checkbox"/> N/C</p> <p>ii) Number of excavation damages? <input type="checkbox"/> S/Y <input checked="" type="checkbox"/> U/N <input type="checkbox"/> N/A <input type="checkbox"/> N/C</p> <p>iii) Number of excavation tickets? <input type="checkbox"/> S/Y <input checked="" type="checkbox"/> U/N <input type="checkbox"/> N/A <input type="checkbox"/> N/C</p> <p>iv) Total number of leaks either eliminated or repaired, categorized by cause? <input type="checkbox"/> S/Y <input checked="" type="checkbox"/> U/N <input type="checkbox"/> N/A <input type="checkbox"/> N/C</p> <p>v) Number of hazardous leaks either eliminated or repaired, categorized by material? (Note: Not required in PHMSA Distribution Annual Report Form 7100.1-1) <input type="checkbox"/> S/Y <input checked="" type="checkbox"/> U/N <input type="checkbox"/> N/A <input type="checkbox"/> N/C</p> <p>vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the DIMP plan in controlling each identified threat? (Note: Not required in PHMSA Distribution Annual Report Form 7100.1-1) <input type="checkbox"/> S/Y <input checked="" type="checkbox"/> U/N <input type="checkbox"/> N/A <input type="checkbox"/> N/C</p>				
Inspector Comments						
24	.1007 (e)	Based on field observations and/or record reviews, is the operator accurately collecting the data used to measure performance in accordance with the procedures in its DIMP plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
25	.1007 (e)	Is the operator monitoring each performance measure from an established baseline?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
26	.1007 (e)	Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(f)	Periodic Evaluation and Improvement				
27	.1007 (f)	Has the operator performed a periodic evaluation of its DIMP plan on the frequency specified in the plan? If a periodic evaluation has not been required since plan implementation or the last inspection, mark questions 27-32 as "N/A".	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
28	.1007 (f)	Did the periodic evaluation include the following: <ul style="list-style-type: none"> • Verification of general system information (e.g., contact information; form names; action schedules, etc.)? • New information acquired since the previous evaluation? • Review of threats and risks? • Was the risk model re-run? • Review of performance measures? • Review of measures to reduce risks? • Evaluation of the effectiveness of measures to reduce risks? • Modification of measures to reduce risks, if necessary? 	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
29	.1007 (e)	If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), did the operator implement new risk reduction measures along with their associated performance measures?	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
30	.1007 (f)	If the periodic evaluation indicates that <u>implemented measures to reduce risks</u> are NOT effective, were risk reduction measures modified, deleted or added?	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

**PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0**

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
31	.1007 (f)	Did the periodic evaluation indicate that the selected <u>performance measures</u> are assessing the effectiveness of risk reduction measures? If not, were performance measures modified, deleted or added? (describe in Inspector comments)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
32	.1007 (f)	Did the operator follow its procedures in conducting periodic evaluation and program improvement?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
	192.1007 (g)	Report results				
33	.1007(g)	Did the operator complete Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) in its submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
	192.1009	What must an operator report when mechanical fittings fail?				
34	.1009	Has the operator maintained accurate records documenting mechanical fitting failures resulting in hazardous leaks?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
35	.1009	Did the operator report all mechanical fitting failures that resulted in a hazardous leak for the previous calendar year to PHMSA and State authorities, as appropriate, by March 15 th of the next calendar year?	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
		Did the reports contain the information required by Department of Transportation Form PHMSA F-7100.1-2?	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
36	.1009	Did the operator follow its procedure(s) for collecting the appropriate information and submitting PHMSA Form F-7100.1-2? Methods to verify include, but are not limited to, the following:	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
		<ul style="list-style-type: none"> • Field observation of the excavation of a failed mechanical fitting • Examination of failed fittings or photographs that have been retained by the operator • Interview with field personnel responsible for collecting information 				
Inspector Comments						

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1011	What records must an operator keep?				
37	.1011	Is the operator retaining the records demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
38	.1011	Did the operator retain for 10 years (or since 08/02/2011) copies of superseded DIMP plans?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
39	.1011	Did the operator follow its DIMP procedures applicable to records retention? If answered "Unsatisfactory/No", then list those procedures not followed below.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
	192.1013	When may an operator deviate from required periodic inspections under this part?				
40	.1013 (c)	Has the operator received approval from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? (If no, mark questions 40-44 "N/A")	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
41	.1013 (c)	Has the operator conducted the periodic inspections at the specified alternate intervals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
42	.1013 (c)	Has the operator complied with all conditions that were required as part of the alternate inspection interval approval? If answered "Unsatisfactory/No", then provide comments below.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

**PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0**

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
43	.1013 (c)	Do performance measure records indicate that an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
44	.1013 (c)	If that an equal or greater overall level of safety has not been achieved, is the operator taking corrective action? Provide comments below regarding corrective actions taken or lack thereof.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

Additional Inspector Comments:

SUPPLEMENTAL INSPECTION QUESTIONS

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked (U, N/A, or N/C must include an explanation if checked)

SUPPLEMENTAL INSPECTION QUESTIONS		S	U	N/A	N/C
NTSB SUPPLEMENTAL INSPECTION QUESTIONS					
Review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization.					x
	If necessary, was remedial action taken?				x
Review operator procedures for surveillance of cast iron pipelines					x
	Was appropriate action taken resulting from tracking circumferential cracking failures, study of failures, study of leakage history, or other unusual operating maintenance condition? (See GPTC Appendix G-18 for guidance)				x
Review operator emergency response procedures for leaks caused by excavation damage near buildings.					x
	Do procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings (Refer to 4/12/01 letter from PHMSA)				x
Review operator records of previous accidents and failures (including reported third party damage and leak response) to ensure appropriate operator response as required by 192.617.					x
THIRD PARTY/EXCAVATION DAMAGE PREVENTION SUPPLEMENTAL QUESTIONS					
Review directional drilling/boring procedures of operator or its contractor – do they include actions to protect their facilities from the dangers posed by drilling and other trenchless technologies?					x
Is operator following its written procedures pertaining to notification of excavation, marking, positive response, and the availability and use of the one-call system?					x
Has operator adopted the CGA Best Practices document as a means of reducing damages to all underground facilities?					x
	If no, encourage and promote the adoption of CGA Best Practices document.				x
Review operators records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617.					x
PLASTIC PIPE DEFECTS/LEAKS & NPMS DATABASE SUPPLEMENTAL QUESTIONS					
Has operator identified any plastic pipe and /or components that have shown a record of defects/leaks?					x
	If yes, what is operator doing to mitigate the safety concerns?				x
If transmission, has operator submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submittal?					x
Comments:					

CYBERSECURITY QUESTIONNAIRE

49 CFR 192.605 Procedural manual for operations, maintenance, and emergencies.
807 KAR 5:022 Section 13(7) Continuing surveillance of operational systems.

1. Does the operator utilize any business or operational systems which may be vulnerable to cybersecurity concerns?

Yes	No	NA	NC
			x

Notes

2. Has the operator developed and implemented a cybersecurity written plan that includes assessing and mitigating vulnerabilities for critical infrastructure and essential business systems? Describe.

Yes	No	NA	NC
			x

Notes

3. Has the operator utilized any internal or external resources and/or personnel assigned specifically with accessing and/or analyzing cybersecurity threats and vulnerabilities? Describe.

Yes	No	NA	NC
			x

Notes

4. Are cybersecurity threats considered as part of the operator's overall operations and maintenance plans?

Yes	No	NA	NC
			x

Notes

5. Has the operator experienced any cyber-attacks related to its business or operational systems? Describe.

Yes	No	NA	NC
			x

Notes

6. Identify personnel with specific responsibilities for cybersecurity within your organization?

	Yes	No	NA	NC
				x

Notes

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